



## THE CITY OF NEW YORK LAW DEPARTMENT

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June 26, 2007

## By Regular Mail

MICHAEL A. CARDOZO

Corporation Counsel

Honorable John G. Koeltl United States District Judge United States District Court Southern District of New York 500 Pearl Street, Room 1030 New York, New York 10007-1312 APPLICATION GRANTED
SO ORDERED

John G. Koeltl, U.S.D.J

Re: Robins v. NYC Board of Education
Docket No. 07 Civ. 3599 (JGK)(KNF)

Dear Judge Koeltl:

I am the Assistant Corporation Counsel in the Office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendant New York City Board of Education (hereinafter referred to as "BOE") in the above-referenced action. I write to respectfully request that the June 28, 2007 deadline for defendant to respond to the Complaint be extended until July 27, 2007. This is defendant's first request for an extension of time to respond to the Complaint, and plaintiff does not consent to this extension of time to respond to the Complaint. When I contacted plaintiff to request an adjournment of defendant's time to respond to the Complaint, plaintiff stated that I should write to the Court to request an extension of time and she also indicated that she was disinclined to consent to any extension of time for defendant to respond to the Complaint because of the BOE's alleged treatment of her.

The reason for this request is that additional time is needed for this office to investigate the allegations in the Complaint which are set forth on thirteen single-spaced pages annexed to the Complaint. Further, while I have requested documents from the BOE in relation to this case, I have not yet received such documents. These records must be reviewed prior to determining and preparing an appropriate response to plaintiff's Complaint. Finally, this case was assigned to me on June 20, 2007, just seven days prior to the date that defendant's response to the Complaint was due. For these reasons, defendant respectfully requests that the Court extend its time to respond to the Complaint from June 28, 2007 until July 27, 2007.

Thank you for your consideration of this request.

Respectfully submitted,

Kevin A. Madden (KM 4999) Assistant Corporation Counsel

cc: Dr. Willodene Robins (by regular mail)